

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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Joint Stock Company “Channel One Russia Worldwide,”
Closed Joint Stock Company “CTC Network,” Closed
(BCM)

Index No. 16-cv-01318 (GBD)

Joint Stock Company “TV DARIAL,” Closed Joint
Stock Company “New Channel”, Limited Liability
Company “Rain TV-Channel,” Limited Liability
Company “Veriselintel,” Open Joint Stock Company
“ACCEPT”, and Limited Liability Company “Comedy TV.”

Plaintiffs,

NOTICE OF MOTION

-against-

INFOMIR LLC (www.infomirusa.com),
PANORAMA TV (www.mypanorama.tv),
GOODZONE TV (www.gudzon.tv),
MATVIL CORPORATION d/b/a eTVnet (www.etvnet.com),
MIKHAIL GAYSTER and
John Does 1-50.

Defendants.

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PLEASE TAKE NOTICE that upon the annexed (i) Declaration of Samuel A. Blaustein with Exhibits; (ii) Affidavit of Christopher Vidulich sworn to on October 17, 2016 (iii) Memorandum of Law; and (iii) all of the prior papers and proceedings had herein; Plaintiffs Joint Stock Company “Channel One Russia Worldwide,” Closed Joint Stock Company “CTC Network,” Closed Joint Stock Company “TV DARIAL,” Closed Joint Stock Company “New Channel,” Limited Liability Company “Rain TV-Channel,” Limited Liability Company “Veriselintel,” Open Joint Stock Company “ACCEPT,” and Limited Liability Company “Comedy TV”; move before this Honorable Court for sanctions against Panorama Alliance LP and its counsel, Alan P. Fraade of Mintz & Fraade Law Firm P.C. pursuant to Rule 37 of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that opposition papers, if any, shall be filed and served in accordance with the Local Rules of the Southern District of New York or as directed by the Court.

Dated: New York, New York
October 17, 2016

Respectfully submitted,

**DUNNINGTON BARTHOLOW & MILLER
LLP**

Attorneys for Plaintiffs

By: /s Raymond J. Dowd

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